



December 29, 2020

**Via Electronic Mail**

David Still  
Plant Manager  
Hanover Foods Corporation  
1486 York Street  
P.O. Box 334  
Hanover, PA 17331  
[dstill@hanoverfoods.com](mailto:dstill@hanoverfoods.com)

Re: Industrial Waste 3-A  
Hanover Foods Industrial Wastewater Treatment Plant  
NPDES Permit No. PA0044741  
Penn Township, York County

Dear Mr. Still:

Based upon a review of our records, including your electronic Discharge Monitoring Reports (“eDMRs”) submitted for July through November 2020, a pattern of effluent violations is evident with respect to the limitations set forth in the Hanover Foods Corporation Industrial Wastewater Treatment Plant (“IWTP”) NPDES Permit No. PA0044741. The monthly eDMR violations are included on pages 3 and 4 of this Notice of Violation (“NOV”).

Additionally, a review of the Hanover Foods Corporation IWTP Chesapeake Bay nutrient monitoring data for the 2020 compliance year revealed the following violation of Part A.1.A of your NPDES Permit No. PA0044741:

| Parameter         |                   | Reported Value | Permit Limit |
|-------------------|-------------------|----------------|--------------|
| Total Nitrogen    | Total Annual Load | >32,539 lbs.   | 26,385 lbs.  |
| Total Phosphorous | Total Annual Load | >1,936 lbs.    | 979 lbs.     |

The Department requests that Hanover Foods Corporation submit, for Department review and comment, a report prepared by a Pennsylvania Professional Engineer summarizing the cause of these violations and the condition and operability of the Hanover Foods Corporation IWTP. The report shall include all corrective steps necessary for the IWTP to comply with all terms and conditions of NPDES Permit No. PA0044741 and a schedule that provides for implementation of

the necessary steps and actions. **Please submit the requested report within sixty (60) calendar days of the date of this correspondence.**

We remind you that a discharge of industrial waste contrary to conditions of your permit constitutes a violation of Sections 301 and 307 of The Clean Streams Law, 35 P.S. §§ 691.301 and 691.307. Sections 602 and 605 of The Clean Streams Law, 35 P.S. §§ 691.602 and 691.605, establish criminal and civil penalty provisions respectively, with civil penalties ranging up to \$10,000 per violation.

You have an obligation to operate and maintain your treatment facilities in accordance with the requirements set forth in your permit. Recognizing your on-going permit obligations as well as the liability for any accrued penalties, you are advised to promptly initiate corrective measures.

This Notice of Violation is neither an order nor any other final action of the Department. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions, please contact me at 717.705.4775 or [eammon@pa.gov](mailto:eammon@pa.gov).

Sincerely,

Erick M. Ammon  
Environmental Protection Compliance Specialist  
Clean Water Program

Cc: Mr. Kumar Navile, Hanover Foods (electronic cc, [knavile@hanoverfoods.com](mailto:knavile@hanoverfoods.com))

## Monthly eDMR violations submitted for July through November 2020.

| DMR Month    | Parameter        |                 | DMR Value        | Permit Limit     |
|--------------|------------------|-----------------|------------------|------------------|
| July-20      | Ammonia-Nitrogen | Average Monthly | 3.6 mg/L         | 1 mg/L           |
| July-20      | Ammonia-Nitrogen | Daily Maximum   | 10.2 mg/L        | 2 mg/L           |
| July-20      | Ammonia-Nitrogen | Average Monthly | 25 lbs/day       | 7 lbs/day        |
| July-20      | Ammonia-Nitrogen | Daily Maximum   | 67 lbs/day       | 14               |
| July-20      | CBOD5            | Average Monthly | 20.3 mg/L        | 10 mg/L          |
| July-20      | CBOD5            | Daily Maximum   | 48.2 mg/L        | 15 mg/L          |
| July-20      | CBOD5            | Average Monthly | 170 lbs/day      | 70 lbs/day       |
| July-20      | CBOD5            | Daily Maximum   | 461 lbs/day      | 105 lbs/day      |
| July-20      | TSS              | Average Monthly | 37 mg/L          | 30 mg/L          |
| July-20      | TSS              | Average Monthly | 310 lbs/day      | 210 lbs/day      |
| July-20      | TSS              | Daily Maximum   | 506 lbs/day      | 420 lbs/day      |
| August-20    | Ammonia-Nitrogen | Average Monthly | < 1.821 mg/L     | 1 mg/L           |
| August-20    | Ammonia-Nitrogen | Daily Maximum   | 3.81 mg/L        | 2 mg/L           |
| August-20    | Ammonia-Nitrogen | Average Monthly | 15 lbs/day       | 7 lbs/day        |
| August-20    | Ammonia-Nitrogen | Daily Maximum   | 35 lbs/day       | 14 lbs/day       |
| August-20    | CBOD5            | Daily Maximum   | 49 mg/L          | 15 mg/L          |
| August-20    | CBOD5            | Average Monthly | 215 lbs/day      | 70 lbs/day       |
| August-20    | CBOD5            | Daily Maximum   | 522 lbs/day      | 105 lbs/day      |
| August-20    | CBOD5            | Average Monthly | 24.3 mg/L        | 10 mg/L          |
| August-20    | TSS              | Daily Maximum   | 448 lbs/day      | 420 lbs/day      |
| September-20 | Ammonia-Nitrogen | Average Monthly | < 1.92 mg/L      | 1 mg/L           |
| September-20 | Ammonia-Nitrogen | Daily Maximum   | 4.06 mg/L        | 2 mg/L           |
| September-20 | Ammonia-Nitrogen | Average Monthly | < 23.0 lbs/day   | 7 lbs/day        |
| September-20 | Ammonia-Nitrogen | Daily Maximum   | 53 lbs/day       | 14 lbs/day       |
| September-20 | CBOD5            | Average Monthly | 74 lbs/day       | 70 lbs/day       |
| September-20 | CBOD5            | Daily Maximum   | 135 lbs/day      | 105 lbs/day      |
| October-20   | CBOD5            | Average Monthly | 35.8 mg/L        | 10 mg/L          |
| October-20   | CBOD5            | Daily Maximum   | 135 mg/L         | 15 mg/L          |
| October-20   | CBOD5            | Average Monthly | 405 lbs/day      | 70 lbs/day       |
| October-20   | CBOD5            | Daily Maximum   | 1634 lbs/day     | 105 lbs/day      |
| October-20   | Fecal Coliform   | IMAX            | 26300 CFU/100 ml | 10000 CFU/100 ml |
| October-20   | Temperature      | Daily Maximum   | 85°F             | 76°F             |
| October-20   | TSS              | Average Monthly | 78 mg/L          | 30 mg/L          |
| October-20   | TSS              | Daily Maximum   | 174 mg/L         | 60 mg/L          |
| October-20   | TSS              | Average Monthly | 861 lbs/day      | 210 lbs/day      |
| October-20   | TSS              | Daily Maximum   | 2106 lbs/day     | 420 lbs/day      |
| November-20  | CBOD5            | Average Monthly | 18.5 mg/L        | 18 mg/L          |
| November-20  | CBOD5            | Daily Maximum   | 52.6 mg/L        | 27 mg/L          |
| November-20  | CBOD5            | Average Monthly | 138 lbs/day      | 126 lbs/day      |
| November-20  | CBOD5            | Daily Maximum   | 310 lbs/day      | 189 lbs/day      |
| November-20  | Dissolved Oxygen | Minimum         | 4 mg/L           | 5 mg/L           |
| November-20  | Temperature      | Daily Maximum   | 84°F             | 69°F             |
| November-20  | Temperature      | Daily Maximum   | 86°F             | 59°F             |
| November-20  | TSS              | Average Monthly | 46 mg/L          | 30 mg/L          |
| November-20  | TSS              | Daily Maximum   | 80 mg/L          | 60 mg/L          |
| November-20  | TSS              | Average Monthly | 348 lbs/day      | 210 lbs/day      |
| November-20  | TSS              | Daily Maximum   | 759 lbs/day      | 420 lbs/day      |

